

EXHIBIT A

**LIST OF ADVERSE WITNESSES FROM WHOM MBIA MAY SEEK TESTIMONY AT
THE HEARING ON THE 9019 MOTION**

Pursuant to Rule 26 of the Federal Rules of Civil Procedure, as incorporated by Rule 7026 of the Federal Rules of Bankruptcy Procedure, MBIA Insurance Corporation (“**MBIA**”), by its attorneys, hereby makes the following disclosure of adverse witnesses (the “**Disclosure**”).

MBIA may call the following individuals as witnesses to testify at any hearing concerning the *Debtors’ Motion Pursuant to Fed. R. Bankr. P. 9019 for Approval of RMBS Trust Settlement Agreements* [Docket No. 320]; the *Debtors’ Supplemental Motion Pursuant to Fed. R. Bankr. P. 9019 for Approval of RMBS Trust Settlement Agreements* [Docket No. 1176]; or the *Debtors’ Second Supplemental Motion Pursuant to Fed. R. Bankr. P. 9019 for Approval of RMBS Trust Settlement Agreements* [Docket No. 1887] (collectively, the “**9019 Motions**”):

1. Mr. Jeffrey Cancelliere
Mortgage Risk Officer
c/o Morrison & Foerster LLP
1290 Avenue of the Americas
New York, NY 10104-0050
(212) 468-8203

Mr. Cancelliere has knowledge of facts, events and circumstances relevant to the 9019 Motion, including the Debtors’ review and evaluation of the RMBS Trust Settlement, as well as knowledge about certain of the Debtors’ business practices, their information systems, and the information gathered and provided by the Debtors in connection with their negotiation of the

proposed RMBS Trust Settlement.¹ Mr. Cancelliere also has knowledge about certain information provided to Ally Financial in connection with its preparation of filings with the Securities and Exchange Commission (“SEC”).

2. Timothy Devine, Esq.
Chief Counsel – Litigation, Ally Financial Inc.
c/o Kirkland & Ellis LLP
655 Fifteenth Street, N.W.
Washington, D.C. 20005
(202) 879-5000

Mr. Devine has knowledge of facts, events and circumstances relevant to the 9019 Motion, including negotiation and approval of the RMBS Trust Settlement, negotiations between the Debtors and the Steering Committee’s counsel, as well as knowledge of the Debtors’ negotiations with Ally Financial in connection with the RMBS Settlement. In addition, Mr. Devine has knowledge about MBIA’s claims. Mr. Devine also has knowledge about Ally Financial’s filings with the SEC.

3. Tammy Hamzhepour, Esq.
General Counsel
c/o Morrison & Foerster LLP
290 Avenue of the Americas
New York, NY 10104-0050
(212) 468-8203

Ms. Hamzhepour has knowledge of facts, events and circumstances relevant to the 9019 Motion, including the negotiation and approval of the RMBS Trust Settlement.

4. Mr. John Mack
Independent Board Member
c/o Morrison & Foerster LLP
1290 Avenue of the Americas
New York, NY 10104-0050
(212) 468-8203

Mr. Mack has knowledge of facts, events and circumstances relevant to the 9019 Motion, including the approval of the RMBS Trust Settlement by the Debtors’ Board of Directors. Mr. Mack also has knowledge about the negotiations between Ally Financial and the Debtors concerning settlement of the Debtors’ claims against Ally Financial in connection with the RMBS Trust Settlement.

¹ Capitalized terms not otherwise defined in this Disclosure have the meanings attributed to them in the 9019 Motions.

5. Mr. Thomas Marano
c/o Morrison & Foerster LLP
1290 Avenue of the Americas
New York, NY 10104-0050
(212) 468-8203

Mr. Marano has knowledge of facts, events and circumstances relevant to the 9019 Motion, including the approval of the RMBS Trust Settlement by the Debtors' Board of Directors. Mr. Marano also has knowledge about the Debtors' relationship with Ally Financial.

6. Mr. Mark Renzi
Managing Director, FTI Consulting, Inc.
c/o Morrison & Foerster LLP
1290 Avenue of the Americas
New York, NY 10104-0050
(212) 468-8203

Mr. Renzi has knowledge of facts, events and circumstances relevant to the 9019 Motion, including the assessment and negotiation of the RMBS Trust Settlement by the Debtors' Board of Directors.

7. John Ruckdaschel, Esq.
Associate General Counsel
c/o Morrison & Foerster LLP
1290 Avenue of the Americas
New York, NY 10104-0050
(212) 468-8203

Mr. Ruckdaschel has knowledge of facts, events and circumstances relevant to the 9019 Motion, including the negotiation of the RMBS Trust Settlement. Mr. Ruckdaschel also has knowledge of the Debtors' securitization business, including, but not limited to, the agreements governing the securitizations sponsored by the Debtors.

Dated: New York, New York
May 15, 2013